

EXHIBIT “A”



FLAGER & YOCKEY
BY: J. Davy Yockey, Esquire
Attorney I.D. #32815
One Northbrook Corporate Center
1210 Northbrook Drive, Suite 280
Trevose, PA 19053
(215) 953-5200

JURY TRIAL OF TWELVE (12)
JURORS IS DEMANDED

Attorney for Plaintiff

IN THE FIRST JUDICIAL DISTRICT OF PENNSYLVANIA

THOMAS B. EREKSON
2979 W. Schoolhouse Lane
Apt. 1203K
Philadelphia, PA 19144

Plaintiff

V.

ASHFORD PHILADELPHIA ANNEX, LLC, f/n/a;
CNL PHILADELPHIA ANNEX, LLC
23-31 N. Juniper Street
Philadelphia, PA 19107

and

MARRIOTT INTERNATIONAL, INC.
10400 Fernwood Road
Bethesda, MD 20817

and

COURTYARD MANAGEMENT CORPORATION;
10400 Fernwood Road
Bethesda, MD 20817

and

COURTYARD BY MARRIOTT LIMITED
PARTNERSHIP
10400 Fernwood Road
Bethesda, MD 20817

and

COURT OF COMMON PLEAS
PHILADELPHIA, PENNSYLVANIA

NO.

COURTYARD BY MARRIOTT II LIMITED :
PARTNERSHIP :
10400 Fernwood Road :
Bethesda, MD 20817 :
and :
CBM ONE CORPORATION :
10400 Fernwood Road :
Bethesda, MD 20817 :
and :
CBM TWO CORPORATION :
10400 Fernwood Road :
Bethesda, MD 20817 :
and :
CBM ONE LLC :
10400 Fernwood Road :
Bethesda, MD 20817 :
and :
CBM TWO LLC :
10400 Fernwood Road :
Bethesda, MD 20817 :
Defendants :

NOTICE

CIVIL ACTION: (2. Personal Injury)
2S Premises Liability

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that, if you fail to do so, the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

PHILADELPHIA BAR ASSOCIATION
Lawyer Referral and Information Service
One Reading Center
Philadelphia, PA 19107
(215) 238-6333

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademias, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL. ESTA OFICINA PUEDE PROVEERLO CON LA INFORMACION NECESARIA PARA ALQUILAR A UN ABOGADO.

SI LE FALTA BASTANTE DINERO PARA ALQUILAR A UN ABOGADO, ES POSIBLE QUE ESTA OFICINA PUEDA PROVEERLO CON LA INFORMACION EN CUANTO A UNAS AGENCIAS LEGALES QUE PUEDE OFRECER UNOS SERVICIOS LEGALES A UN PRECIO REBAJADO PARA LOS QUE SON ELIGIBLES.

ASOCIACION DE LICENCIADOS DE FILADELFIA
Servicio De Referencia E Informacion Legal
One Reading Center
Filadelfia, Pennsylvania 19107
(215) 238-6333

CIVIL ACTION COMPLAINT

1. Plaintiff, Thomas B. Erekson is an adult individual residing at 2979 W. Schoolhouse Lane, Apt. 1203K, Philadelphia, Pennsylvania.
2. Defendant, Ashford Philadelphia Annex, LLC f/n/a CNL Philadelphia Annex, LLC is a Limited Liability Company organized and existing under the laws of the state of Delaware, authorized to conduct business in the Commonwealth of Pennsylvania with a principal place of business located at 23-31 N. Juniper Street, Philadelphia, Pennsylvania.
3. Defendant, Marriott International, Inc. is a corporation organized and existing under the laws of the state of Delaware, authorized to conduct business in the Commonwealth of Pennsylvania with a principal place of business located at 10400 Fernwood Road, Bethesda, Maryland.
4. Defendant, Courtyard Management Corporation is a corporation organized and existing under the laws of the state of Delaware, authorized to conduct business in the Commonwealth of Pennsylvania with a principal place of business located at 10400 Fernwood Road, Bethesda, Maryland.
5. Defendant, Courtyard By Marriott Limited Partnership is a limited partnership organized and existing under the laws of the Commonwealth of Pennsylvania with a registered office located at 10400 Fernwood Road, Bethesda, Maryland.
6. Defendant, CBM One Corporation is a corporation organized and existing under the laws organized and existing under the laws of the state of Delaware, authorized to conduct business in the Commonwealth of Pennsylvania with a registered address of 10400 Fernwood Road, Bethesda, Maryland. At all times material hereto, Defendant,

CBM One Corporation is the General Partner of Defendant, Courtyard By Marriott Limited Partnership.

7. Defendant, Courtyard By Marriott II Limited Partnership is a limited partnership organized and existing under the laws of the Commonwealth of Pennsylvania with a registered office located at 10400 Fernwood Road, Bethesda, Maryland.
8. Defendant, CBM Two Corporation is a corporation organized and existing under the laws organized and existing under the laws of the state of Delaware, authorized to conduct business in the Commonwealth of Pennsylvania with a registered address of 10400 Fernwood Road, Bethesda, Maryland. At all times material hereto, Defendant, CBM Two Corporation is the General Partner of Defendant, Courtyard By Marriott II Limited Partnership.
9. Defendant, CBM One LLC is a Limited Liability Corporation organized and existing under the laws organized and existing under the laws of the state of Delaware, authorized to conduct business in the Commonwealth of Pennsylvania with a registered address of 10400 Fernwood Road, Bethesda, Maryland. At all times material hereto, Defendant, CBM One LLC is the General Partner of Defendant, Courtyard By Marriott Limited Partnership.
10. Defendant, CBM Two LLC is a Limited Liability Company organized and existing under the laws organized and existing under the laws of the state of Delaware; authorized to conduct business in the Commonwealth of Pennsylvania with a registered address of 10400 Fernwood Road, Bethesda, Maryland. At all times material hereto, Defendant, CBM Two LLC is the General Partner of Defendant, Courtyard By Marriott II Limited Partnership.

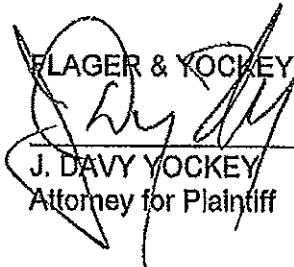
11. At all times relevant, Defendants, by and through their agents, servants, workmen and/or employees were responsible for the maintenance, supervision and control of the premises known as the Courtyard Marriott located at or near 21 N. Juniper Street, Philadelphia, Pennsylvania (hereinafter referred to as the "premises").
12. On or about May 26, 2010, Plaintiff, Thomas B. Erikson, a public invitee, was traversing the Defendants' premises at or near its main entrance when Plaintiff was caused to trip and fall due to a dangerous, uneven surface which resulted from the improper joinder of a metal cover plate, concrete and stone surface walkway adjacent to a support pillar for the main entrance portico.
13. At all times relevant hereto, the Defendants, through their agents, servants, workmen and/or employees, had actual and/or constructive notice of the dangerous condition of the premises recited in the paragraph above, or, in the alternative, had by their own acts and/or omissions, created the dangerous and defective condition complained of, and are therefore deemed to have actual notice of the same.
14. The negligence and carelessness of the Defendants consisted of but is not limited to the following:
 - (a) permitting or allowing dangerous conditions to exist in and upon the premises after they knew or should have known of said condition;
 - (b) failing to give plaintiff proper and due notice of the dangerous conditions existing on the premises under their ownership, care and supervision;
 - (c) careless maintenance of defective metal plate, or concrete or stone surface adjacent to the metal plate which presented a tripping hazard to public invitees;
 - (d) failing to give Plaintiff proper and adequate protection to which he was

entitled to as a public invitee pedestrian;

- (e) failing to inspect and/or negligently inspecting the premises;
 - (f) careless placement of planter(s) and trash receptacle(s) to promote invitees' access to the dangerous tripping hazard;
 - (g) improper training and use of valet personnel which induced pedestrians to traverse the dangerous condition;
15. As a direct result of the aforesaid negligence and carelessness of the Defendants, Plaintiff, sustained serious and painful injuries, including but not limited to: fractures to lower left extremity, development of plantar fasciitis, disfigurement, gait dysfunction and damage to his bones, cells, muscles, tissues and nervous system, some or all of which may be permanent in nature.
16. As a further result, Plaintiff has been forced to expend various and diverse sums of money in an effort to treat and cure his injuries and ills and may be required to do so for an indefinite period of time into the future.
17. As a further result, Plaintiff has suffered in the past and may suffer in the future mental anguish, emotional suffering and other economic and non-economic losses.
18. As a further result, Plaintiff has suffered an interference with his usual duties, chores, life's pleasures and opportunities and may continue to suffer such interference in the future.
19. As a further result, Plaintiff has suffered and will continue to suffer a severe loss of earnings and/or impairment of earning capacity or power as a result of the injuries sustained herein.

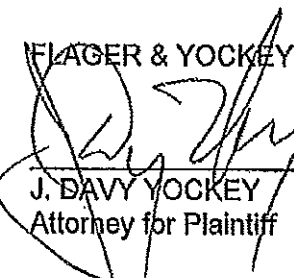
WHEREFORE, Plaintiff, THOMAS B. EREKSON, demands judgment against ALL

DEFENDANTS, jointly and severally, in an amount in excess of Fifty Thousand (\$50,000.00)
Dollars, plus interest, costs of suit and delay damages.

BY:  FLAGER & YOCKEY, P.C.
J. DAVY YOCKEY
Attorney for Plaintiff

JURY DEMAND

Plaintiff hereby demands a jury trial of twelve jurors.

BY:  FLAGER & YOCKEY, P.C.
J. DAVY YOCKEY
Attorney for Plaintiff

VERIFICATION BASED UPON PERSONAL KNOWLEDGE
AND INFORMATION SUPPLIED BY COUNSEL

I, Thomas Ecker, verify that I am the Plaintiff in the foregoing action and that the attached Complaint is based upon the information which has been gathered by my counsel in preparation of this lawsuit. The language of the Complaint is that of counsel. I have read the Complaint, and to the extent that it is based upon information which I have given to my counsel, it is true and correct to the best of my knowledge, information and belief. To the extent that the contents of the Complaint are that of counsel, I have relied upon counsel in making this Verification.

I understand that intentional false statements herein are made subject to the penalties of 18 Pa. C.S. A. §4904 relating to unsworn falsifications made to authorities.

X Thomas B. Ecker

5/24/12
DATED